

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SJUNDE AP-FONDEN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

THE GOLDMAN SACHS GROUP, INC.,
LLOYD C. BLANKFEIN, HARVEY M.
SCHWARTZ, AND GARY D. COHN,

Defendants.

Civil Case No. 1:18-cv-12084-VSB

**STIPULATION AND [PROPOSED]
ORDER**

WHEREAS, on September 19, 2019, the Court issued an Opinion & Order (ECF No. 56) (“Lead Plaintiff Order”) appointing Sjunde AP-Fonden as Lead Plaintiff (“Plaintiff”), Kessler Topaz Meltzer & Check, LLP as Lead Counsel, and Bernstein Litowitz Berger & Grossmann LLP as Liaison Counsel;

WHEREAS, pursuant to the Lead Plaintiff Order, Plaintiff was directed to file a second amended complaint no later than sixty (60) days after the date of issuance of the Lead Plaintiff Order and Defendants were directed to answer or otherwise respond to the second amended complaint no later than sixty (60) days after Plaintiff served the second amended complaint;

WHEREAS, on October 28, 2019, Plaintiff filed the Second Amended Class Action Complaint (“Amended Complaint”) (ECF No. 63);

WHEREAS, the Amended Complaint named Gary D. Cohn as an additional defendant to this action;

WHEREAS, the parties have conferred regarding service of the Amended Complaint on Mr. Cohn;

WHEREAS, the undersigned counsel is authorized to and has agreed to accept service of the Amended Complaint on behalf of Mr. Cohn;

WHEREAS, pursuant to the Lead Plaintiff Order, Defendants must answer, move to dismiss, or otherwise respond to the Amended Complaint on or before December 27, 2019;

WHEREAS, Defendants intend to move to dismiss the Amended Complaint; and

WHEREAS, the parties recognize the need for a briefing schedule related to Defendants' forthcoming motion to dismiss.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to this action, as follows:

The undersigned counsel acknowledges that it has accepted service of the Second Amended Class Action Complaint in this action on behalf of all Defendants, including Mr. Cohn.

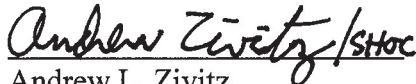
The following briefing schedule and page limitations shall govern Defendants' forthcoming motion to dismiss the Amended Complaint:

1. Defendants' motion to dismiss the Amended Complaint shall be filed on or before January 9, 2020. Defendants' joint memorandum in support of the motion shall be a single brief not exceeding 50 pages;
2. Plaintiff's memorandum in opposition to Defendants' motion to dismiss the Amended Complaint shall be filed on or before March 13, 2020 and shall not exceed 50 pages; and
3. Defendants' joint reply memorandum in support of the motion to dismiss the Amended Complaint shall be filed on or before April 27, 2020 and shall not exceed 25 pages.

Except as to the defense of insufficiency of service of process, by entering into this Stipulation, Defendants do not waive, and hereby expressly preserve, all potential defenses in this litigation, including but not limited to defenses relating to venue or jurisdiction.

Dated: November 25, 2019

**KESSLER TOPAZ
MELTZER & CHECK, LLP**

/s/Andrew L. Zivitz

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Lead Counsel for Sjunde AP-Fonden and the Class

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Respectfully submitted,

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Attorneys for Defendants The Goldman Sachs Group, Inc., Lloyd C. Blankfein, Harvey M. Schwartz and Gary D. Cohn

Dated: _____

SO ORDERED.

Hon. Vernon S. Broderick U.S.D.J.